

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. 3:25-cv-00417-HTW-LGI
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING,
MISSISSIPPI COMMUNITY COLLEGE
BOARD, MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,

Defendants.

DECLARATION OF JAIME HARKER

Pursuant to 28 U.S.C. § 1746, I, Jaime Harker, make the following declaration under penalty of perjury:

1. My name is Jaime Harker. Since 2008, my place of residence has been Water Valley, Mississippi.
2. Since 2003, I have been a Professor of English affiliated with the University of Mississippi. Since 2016, I have also been the director of the University's Sarah Isom Center for Women and Gender Studies.

3. Many of the concepts banned by the law are essential to my job, my academic freedom, and the exercise of my rights to free speech as part of my job. I want to continue doing my job as before.
4. My work is impacted by the following sections of HB 1193: 3(b), 3(i) and 3(f). I teach classes on gender studies and direct the Sarah Isom Center which is focused on women and gender. All of my classes on gender studies may be partially or fully prohibited by the law. Even if my gender studies classes are allowed to continue, the law may ban large parts of my curriculum which are essential to understanding and learning gender studies. The law may, among other consequences, require a name change for the Sarah Isom Center for Women and Gender Studies.
5. I will teach a graduate level gender studies class this fall. All of the materials that I currently use to teach my classes may be banned by the law. For example, "Our Bodies Ourselves" is a book produced by a nonprofit about women's health. "Against Our Will: Men, Women and Rape" by Susan Brownmiller was one of the first to discuss sexual violence.
6. After the law was passed, in Spring 2025, I was instructed by the University of Mississippi that all University entities including the Sarah Isom Center could no longer sponsor Oxford Pride Week. Sponsorship of Pride Week was transferred to student groups. This rule included the withdrawing of funds: \$4,400 originally committed to Oxford Pride was revoked because it came from University departments or schools. It also prohibited use of University property, like golf carts, at the Oxford Pride parade. . In addition, while University departments and centers had marched as entities in the Oxford Pride parade in the past, the University prohibited any University entity from marching in its official status. In the end, seven University departments or schools were prohibited from marching in the parade as they had done in the past. People were only allowed to march in their individual capacities. Finally, even though it was ultimately determined to be permissible, organizers cancelled two Pride

Week events and five University affiliated entities withdrew their participation in the Oxford Pride resource fair because it was unclear whether they could participate.

7. I have drafted a disclaimer to add to my syllabus because of the law, but I do not intend to self-censor. I believe teaching as I have in the past is essential to my free speech rights and to my academic freedom and to my students' getting a quality education.
8. All colleges and universities in Mississippi are accredited by the Southern Association of Colleges and Schools Commission on Colleges, which requires institutes of higher learning to preserve and protect academic freedom. Further, SACSCC requires that the institution place primary responsibility for the content, quality and effectiveness of the curriculum with its faculty. I believe HB 1193 violates the academic freedom of faculty and students, removes responsibility for the quality of curriculum from the faculty, and therefore prohibits the University of Mississippi from complying with its accreditation standards.
9. Many provisions of the act are vague, confusing, and inconsistent, and make it difficult for me to differentiate what is prohibited from what is allowed. Because the law is unclear, I am afraid that I could face serious repercussions for teaching as I currently do. I am vulnerable to complaints that I am violating the law. I fear I could lose my job and my actions could result in the withdrawal of funds to the University. Thus while I do not intend to self-censor in class, some of my speech could nonetheless be chilled.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 18, 2025


Jaime Harker